

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

OLEG CHURYUMOV,

Plaintiff,

v.

AMAZON CORPORATE LLC; UWAIS  
KHAN; EDWIN MWANGO; ANDREW  
BERG; JOE RESUDEK; ROBIN  
MENDELSON; JEFF BEZOS; and BETH  
GALETTI,

Defendants.

No. 2:19-cv-00136-RSM

DEFENDANTS' RESPONSE TO  
PLAINTIFF'S THIRD MOTION TO  
AMEND COMPLAINT

NOTE FOR MOTION CALENDAR:

Friday, January 10, 2020

**DEFENDANTS' RESPONSE TO PLAINTIFF'S THIRD MOTION TO AMEND  
COMPLAINT**

Defendants submit the following Response to Plaintiff Oleg Churyumov's ("Plaintiff") Third Motion for Leave to Amend and Supplement Complaint ("Third Motion to Amend"), Dkt. #59.

On November 25, 2019, the Court issued an Order granting Plaintiff leave to amend his Complaint in accordance with its rulings. Dkt. #58 at p. 25 ¶ 6 ("Plaintiff may file an amended complaint no later than thirty (30) days from the date of this Order."). The Court further held that "[n]othing in this Order precludes Defendants from moving to dismiss any amended complaint should they believe such action is warranted and legally supported." *Id.* ¶ 7. Rather than file an amended complaint, on December 22, 2019, Plaintiff filed a Third Motion to Amend his Complaint. Dkt. #59.

Accordingly, because the Court granted Plaintiff leave to amend his complaint in accordance with its Order, Defendants do not oppose Plaintiff's Motion to Amend. If the Court grants the motion, once Plaintiff files the amended complaint, Defendants will file and serve an appropriate response to the amended complaint within the time permitted by the rules or order of this Court.

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2 DATED: January 6, 2020

By: s/ Linda D. Walton  
By: s/ Lindsay J. McAleer  
Linda D. Walton, WSBA #20604  
Lindsay J. McAleer, WSBA #49833

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5 **Perkins Coie LLP**

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9 Attorneys for Defendants  
Amazon Corporate LLC, Uwais Khan, Edwin  
Mwango, Andrew Berg, Joe Resudek; Robin  
Mendelson, Jeff Bezos, and Beth Galetti

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DEFENDANTS' RESPONSE TO THIRD MOTION TO  
AMEND COMPLAINT (No. 2:19-cv-00136-RSM)–2

**Perkins Coie LLP**  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
Phone: 206.359.8000  
Fax: 206.359.9000

**CERTIFICATE OF SERVICE**

I hereby certify that on January 6, 2020, I caused to be served upon the party below, at the address stated below, via the method of service indicated, a true and correct copy of the foregoing document.

Oleg Churyumov	<input type="checkbox"/>	Via Hand Delivery
1037 NE 65th St. #81067	<input type="checkbox"/>	Via U.S. Mail, 1st Class,
Seattle, WA 98115		Postage Prepaid
Telephone: (917) 514-1426	<input type="checkbox"/>	Via Overnight Delivery
Email: oleg.churyumov@gmail.com	<input type="checkbox"/>	Via Facsimile
	<input checked="" type="checkbox"/>	Via CM/ECF
<b>Pro se Plaintiff</b>	<input type="checkbox"/>	Via E-Mail

**I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.**

EXECUTED at Seattle, Washington, on January 6, 2020.

s/ Lindsay J. McAleer  
Lindsay J. McAleer #49833